

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

CGG 19-025702
LOGS Legal Group LLP
14000 Commerce Parkway, Suite B
Mount Laurel, NJ 08054
(856) 793-3080
Kathleen M. Magoon - 040682010
Elizabeth L. Wassall - 023211995
ATTORNEYS FOR WILMINGTON SAVINGS FUND
SOCIETY, FSB, AS TRUSTEE OF STANWICH
MORTGAGE LOAN TRUST I

In Re:

JENNIE A. TUMMINELLO,
DEBTOR

Case No.: 19-16297-CMG

Judge: HONORABLE CHRISTINE M.
GRAVELLE

Chapter: 13

NOTICE OF OBJECTION TO CONFIRMATION

The undersigned, LOGS Legal Group LLP, attorneys for the Secured Creditor, Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust I, the holder of a Mortgage on Debtor's property located at 213 Blaine Avenue, Seaside Heights, NJ 08751, hereby objects to the Confirmation of the Debtor's proposed Modified Chapter 13 Plan, ECF # 84, on the following grounds:

- 1) Debtor's proposed Modified Chapter 13 Plan does not provide for payment of post-petition arrears in the amount of \$6,776.43 to Secured Creditor per the Consent Order entered November 16, 2022.
- 2) Debtor's proposed Modified Chapter 13 Plan does not provide for the Secured Creditor to receive distributions with a value equal to the allowed amount of its claims required by 11 U.S.C.1325(a)(5)(B)(ii).
- 3) Debtor's proposed Modified Chapter 13 Plan provides for a possible sale of the property, which is speculative, and does not give direction in the event the sale is not completed.

4) Debtor's proposed Modified Chapter 13 Plan does not provide for ongoing contractually due post-petition payments during the sale of the property, in violation of 11 U.S.C. 1322(b)(5).

WHEREFORE, Wilmington Savings Fund Society, FSB, as trustee of Stanwich Mortgage Loan Trust I respectfully requests that the Confirmation of Debtor's Modified Chapter 13 Plan be denied.

LOGS LEGAL GROUP LLP

By: /s/Elizabeth L. Wassall
Kathleen M. Magoon - 040682010
Elizabeth L. Wassall - 023211995

Dated: 10-27-2023

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CERTIFICATION OF SERVICE

I, Valerie Feliz the undersigned

1. ☐ represent the _____ in the above-captioned matter.
☒ am the secretary/paralegal for Kathleen M. Magoon, Esquire and Elizabeth L. Wassall, Esquire, who represents the Secured Creditor in the above-captioned matter.
☐ am the _____ in the above case and am representing myself.
2. On 10/27/2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:
 - Notice of Objection to Confirmation
3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Signature

Dated: 10/27/2023

/s/Valerie Feliz

Printed Name

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Candyce Ilene Smith-Sklar Law Offices of Sklar Smith-Sklar 1901 North Olden Avenue Suite 22 Ewing, NJ 08618		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
Jennie A. Tumminello 213 Blaine Ave. Apt. A Seaside Heights, NJ 08751		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.